

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

PFC PROPERTIES, INC., a Washington for-profit corporation; CHARLES FERNER, a married individual and officer of PFC Properties, Inc., and his spouse; KIMBERLEE FERNER; and PAUL HALL, an individual and officer of PFC Properties, Inc.;

Plaintiffs,

vs.

AMTRUST NORTH AMERICA, dba, SECURITY NATIONAL INSURANCE COMPANY, an insurance company; and CLEAR SPRINGS PROPERTY AND CASUALTY COMPANY, an insurance company,

Defendants.

No. 3:22-cv-5022-MJP

**STIPULATED MOTION FOR ORDER  
TO EXTEND DEADLINE FOR  
DEFENDANTS AMTRUST NORTH  
AMERICA, DBA SECURITY  
NATIONAL INSURANCE COMPANY  
AND CLEAR SPRING PROPERTY AND  
CASUALTY COMPANY TO ANSWER  
COMPLAINT**

**NOTED FOR CONSIDERATION:  
JANUARY 20, 2022**

**I. STIPULATION**

In support of the stipulation to extend the time for Defendants Amtrust North America, dba Security National Insurance Company and Clear Spring Property and Casualty Company to respond to the complaint, the Parties make the following recitals:

WHEREAS, Defendant Clear Spring Property and Casualty Company filed the removal action on January 12, 2022 and served Plaintiffs PFC Properties, Inc., Charles Ferner, Kimberlee

1 Ferner and Paul Hall (“Plaintiffs”) with the removal action on January 12, 2022;

2 WHEREAS, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Defendants must respond to the  
3 Complaint by January 19, 2022;

4 WHEREAS, the Plaintiff and Defendants are discussing early resolution of this matter;

5 WHEREAS, this Stipulation will not alter the date of any event or deadline already fixed  
6 by the Court; and

7 WHEREAS, no prior extensions of time have been granted in this matter.

8 NOW THEREFORE, the Plaintiff and Defendants agree as follows:

9 1. Defendants may have a 20-day extension of time, until and including, February 9,  
10 2022, to respond to Plaintiff’s Complaint; and

11 IT IS SO STIPULATED AND AGREED.

12 DATED this 20<sup>th</sup> day of January, 2022

DATED this 20<sup>th</sup> day of January, 2022

13 FORSBERG & UMLAUF, P.S.

SCUDERI LAW OFFICES, P.S.

14 s/ Ryan J. Hesselgesser

s/ Joseph Scuderi

15 Ryan J. Hesselgesser, WSBA #40720  
16 Attorneys for Defendant Clear Spring  
Property and Casualty Company

Joseph Scuderi, WSBA #26623  
Jeremy Dobbins, WSBA #47709  
Attorneys for Plaintiffs

17 DATED this 20<sup>th</sup> day of January, 2022

18 BULLIVANT HOUSER BAILEY, PC

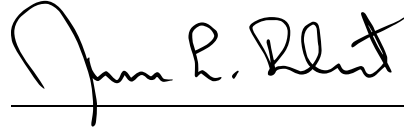
19 s/ Michael A. Guadagno

20 Michael A. Guadagno, WSBA #34633  
21 Attorneys for Defendant Amtrust North  
22 America  
23

1 **II. ORDER**

2 It Is So Ordered.

3 IT IS SO ORDERED this 20th day of January, 2022.

4  
5 

6 JAMES L. ROBART  
7 United States District Judge

8 Presented by:

9 FORSBERG & UMLAUF, P.S.

10  
11 s/ Ryan J. Hesselgesser  
12 Ryan J. Hesselgesser, WSBA #40720  
13 *Attorneys for Defendant Clear Spring*

14 Approved as to form;  
15 SCUDERI LAW OFFICES, P.S.

16 s/ Joseph Scuderi  
17 Joseph Scuderi, WBSA #26623  
18 Jeremy Dobbins, WSBA #47709  
19 *Attorneys for Plaintiffs*

20 BULLIVANT HOUSER BAILEY, PC

21 s/ Michael A. Guadagno  
22 Michael A. Guadagno, WSBA #34633  
23 *Attorneys for Defendant Amtrust North America*